

**Kent Krause**

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**From:** Kent Krause  
**Sent:** Tuesday, February 02, 2016 4:56 PM  
**To:** 'Mfitzpatrick@adhknox.com'  
**Subject:** SSC/Cumberland Medical/Crossville Medical

Mike:

Thank you for speaking with me today. This confirms you are going to take the steps necessary to preserve the old server being stored at Crossville Medical. You are also going to take the steps necessary to cease the destruction of emails on the current server for email accounts for Dr. Fox. In talking with co-counsel we wondered if the easiest thing to do is get your IT folks to create .PST files for both servers for the email accounts. This would require creating such a file for the current server as of the date that is accomplished, but then would allow for return to your standard document destruction policy. As for the old server, your IT folks would have to power that up and connect to a computer and then create the .PST file for any of Dr. Fox's accounts on that server. Once these things are accomplished and the files are transferred to us, your involvement would come to an end on this issue. Anyway, just a suggestion.

As for the subpoena, I don't have much more to report. I believe they are seeking the same sort of information from the Dell computers that they are from the above referenced servers. However, they have not shared that with us. We would like to know, as soon as possible, whether those computers are still in your client's possession, and if not, what happened to them. If they are in your client's possession, we would like to know if they are in storage or in use. In either event, we would like to know if they were wiped clean of any information before going into or during storage, or going into use.

Thanks for your help.

*Kent E. Krause*  
*Attorney at Law*



BREWER KRAUSE  
BROOKS & CHASTAIN  
PLLC

611 Commerce St., Ste. 2600, Nashville, TN 37203  
Mailing: P.O. Box 23890, Nashville, TN 37202-3890  
Website: [www.bkblaw.com](http://www.bkblaw.com)

Direct: 615-630-7755 Fax: 615-256-8985

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